

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

NATHANIEL KING

Plaintiff,

v.

**DFW INTERNATIONAL AIRPORT
BOARD,
Defendant.**

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CIVIL ACTION NO. 4:22-CV-929-P

DEFENDANT'S DESIGNATION OF EXPERTS

TO: Nathaniel King, Plaintiff, by and through his attorney of record, Wes Dauphinot, Law Offices of Wes Dauphinot, P.C., 900 West Abram, Arlington, Texas 76103.

Pursuant to Federal Rule of Civil Procedure 26(a), Defendant hereby designates the following expert in this lawsuit:

1. **CAROLINE C. HARRISON**, PHAM HARRISON LLP, 505 Pecan Street, Suite 200, Fort Worth, Texas 76102, telephone number (817) 632-6300.

Caroline C. Harrison is Board Certified in Labor and Employment Law. Ms. Harrison graduated from Texas Wesleyan University School of Law in 2004, and has been licensed in the State of Texas since 2004. Ms. Harrison practiced law in Fort Worth with Cantey Hanger, LLP from 2004 to 2015. On July 1, 2015, Ms. Harrison and her partners Lu Pham and David B. Dowell, opened the firm Dowell Pham Harrison, LLP, now known as Pham Harrison LLP, in Fort Worth, Texas. Ms. Harrison's practice is focused on labor and employment litigation.

Ms. Harrison will testify regarding knowledge of the fees, expenses and costs incurred in this case, based upon the time records maintained by Pham Harrison LLP, and the reasonableness and necessity for the fees, expenses and costs incurred by Defendant. Ms. Harrison will also testify for purposes of rebutting any evidence offered by Plaintiff related to his claim for attorney's fees in this lawsuit, if any.

Defendant believes that Ms. Harrison will testify that she is aware of the time that has been expended on Defendant's behalf by attorneys, legal assistants, and experts, as well as costs of litigation; the time requirements for representing Defendant; the novelty and difficulty of the issues involved in this litigation; the skills requisite to

perform the legal services necessary on behalf of Defendant; the fees sought; the time limitations imposed by the circumstances of this litigation; and the conduct and activities in pre-trial and the trial of this case.

Ms. Harrison has reviewed the existing documents filed by and exchanged by the parties and will review any future documents relating to Defendant's claim for attorney's fees. All such documents will be made available for inspection, at the time Defendant is awarded attorneys' fees, if any. This expert will also review any documents produced by Plaintiff in support of his claim for attorney's fees, if any,

The curriculum vitae for Ms. Harrison is being produced with this Designation.

2. At this time, Defendant has not retained or specifically employed any other person to provide expert testimony. Any other expert, including responsive or rebuttal experts, will be designated later pursuant to the Court's Order or by agreement of the Parties.
3. **All experts designated by Plaintiff.**

Defendant reserves the right to seek testimony from any expert designated by Plaintiff on any topic for which the expert has been designated. The purpose of seeking such testimony is to rebut Plaintiff's allegations and defenses in this lawsuit, as well as to support Defendant's allegations and requests for relief in this lawsuit.

Respectfully submitted,

By: /s/ Caroline C. Harrison

Caroline C. Harrison

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing instrument has been sent via electronic filing on the 28th day of February, 2023, to all parties at following address:

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/s/ Caroline C. Harrison
Caroline C. Harrison